

To: Daly, Carl[Daly.Carl@epa.gov]; Jackson, Scott[Jackson.Scott@epa.gov]; Laumann, Sara[Laumann.Sara@epa.gov]
Cc: Hinkle, Vanessa[Hinkle.Vanessa@epa.gov]
From: Russ, Timothy
Sent: Thur 3/6/2014 5:10:19 PM
Subject: FW: Letter from WDEQ to BLM - State Interpretation of Permits for General Conformity Purposes
[WDEQ_ConformityLtr_PermittedSources.pdf](#)

Hi Carl, Scott, and Sara,

Vanessa advised me that she was on a call last week with the BLM and State (and perhaps some political folks) discussing NEPA projects. Apparently WYDEQ stated on the call that they had sent a letter to the BLM addressing the State's permits and general conformity. Vanessa advised me that after the call she contacted Cole Anderson (WYDEQ) and asked for a copy of the letter, but it appears below that actually Charis (BLM) sent her a copy.

Ex. 5 - Attorney Client

A.) The beginning of the second paragraph states:

“Under the authority of Chapter 6, Section 2 of the WAQSR and the application of Best Available Control Technology (BACT), the Air Quality Division (Division) issues permits which address emissions from, but are not limited to, the following oil and gas source categories: storage tanks, dehydration units, process heaters, pneumatic equipment. separation vessels. truck loading, fugitives, engines.”

The third, conclusionary paragraph then states:

“Sources with permits issued under the authority of Wyoming's EPA approved new source review

permitting program (WAQSR Chapter 6, Section 2) are exempt from a general conformity determination.”

Ex. 5 - Attorney Client

“At the discretion of the Administrator, the Division has also issued permits for reducing emissions from temporary sources such as well completion activities and well blowdown and venting episodes. The Division also worked with operators in the Jonah/Pinedale Development Area (JPDA) to permit drill rigs. These permits were issued to the operators on a voluntary basis under the State of Wyoming's EPA approved minor source permitting program and as such, include federally enforceable emission limits and conditions for reducing emissions from these sources. While the operators submitted permit applications for the drill rigs on a voluntary basis, compliance with the permit conditions and associated limits is not.”

Ex. 5 - Attorney Client

“Sources with permits issued under the authority of Wyoming's EPA approved new source review

permitting program (WAQSR Chapter 6, Section 2) are exempt from a general conformity determination.”

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See what you think and thanks!

Tim

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From: Hinkle, Vanessa
Sent: Tuesday, March 04, 2014 9:14 AM
To: Russ, Timothy
Cc: Strobel, Philip; Jackson, Scott
Subject: FW: Letter from WDEQ

Letter from WDEQ regarding permitted sources and general conformity.

From: Tuers, Charis [<mailto:ctuers@blm.gov>]
Sent: Tuesday, March 04, 2014 9:06 AM
To: Hinkle, Vanessa
Subject: Letter from WDEQ

Referred to BLM

Charis A. Tuers

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